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Special Counsel To Richard A. Marshack,
Current Liquidating Trustee of the LPG Liquidation Trust

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:
THE LITIGATION PRACTICE GROUP P.C.

Debtor,

Chapter 11

Case No.: 23-bk-10571-SC

**NOTICE OF MOTION FOR AN ORDER
EXTENDING THE ESTATE’S TIME TO
FILE ACTIONS GOVERNED BY 11
U.S.C. §§108, 546(a), AND 549(d)**

[NO HEARING REQUIRED PURSUANT
TO LBR 9013-1(O)]

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER INTERESTED
PARTIES:

PLEASE TAKE NOTICE that Richard A. Marshack, in his capacity as the former Chapter 11 Trustee (“Trustee”) for the Bankruptcy Estate (“Estate”) of the Litigation Practice Group P.C. (“Debtor”) and current Liquidating Trustee of the LPG Liquidation Trust has filed a motion for an order extending the Estate’s time to file actions governed by 11 U.S.C. §§ 108, 546(a)(1), and 549(d) for a period of approximately 180 days to September 15, 2025 (“Motion”).

In this case, the deadline to file prepetition actions under 11 U.S.C. § 108, to avoid prepetition transfers under 11 U.S.C. § 546(a), and to avoid post-petition actions under 11 U.S.C. § 549(d) (collectively, “Litigation Deadlines”) will expire on March 19, 2025.

Trustee has not been idle in this matter. The Trustee's motion and the declaration of Richard Marshack, filed concurrently herewith, explains how the Trustee has diligently investigated and untangled the complex affairs of Debtor, its principals, associates, and affiliated businesses. As a result, Trustee has initiated and prosecuted dozens of adversary proceedings and has already recovered millions of dollars for the benefit of Debtor's numerous creditors, many of whom are the previous consumer clients of Debtor. Despite significant challenges, including: concealment, and in some cases, destruction of relevant evidence; reticent percipient witnesses; and other litigation-related obstacles, Trustee's ongoing investigation has been prolific. He believes it will reveal additional defendants. It is for this reason that Trustee is requesting an extension of approximately 180 days to September 15, 2025 to file additional complaints. The complete scope and terms of the relief are detailed in the Motion, a copy of which can be obtained by contacting Yosina Lissebeck or Christopher Ghio whose contact information is listed in the top left-hand corner of this Notice.

PLEASE TAKE FURTHER NOTICE that any response and request for hearing as to the proposed relief must be in the form as required by Rules 9013-1(f) and (o) of the Local Bankruptcy Rules ("LBR") and filed with the Clerk of the above-entitled Court. The deadline for any response and request for hearing is 14 days after the date of service of this Notice, plus an additional 3 days unless this Notice was served by personal delivery or posting as described in F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any response or request for hearing must be served on Dinsmore & Shohl LLP to the attention of Yosina Lissebeck and Christopher Ghio at the address indicated above and served on the Office of the United States Trustee, 411 W. Fourth Street, Suite 7160, Santa Ana, CA 92701.

Failure to timely respond may be deemed as acceptance of the proposed relief. See LBR 9013-1(h).

Dated: February 19, 2025

DINSMORE & SHOHL LLP

By: /s/ Yosina M. Lissebeck
Yosina Lissebeck
Special Counsel To Richard A. Marshack,
Former Chapter 11 Trustee, current
Liquidating Trustee of the LPG
Liquidation Trust

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document: **Notice of Motion For An Order Extending The Estate's Time To File Actions Governed By 11 U.S.C. §§ 108, 546(a), and 549(d)**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On February 19, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On February 19, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

YCIR Inc.
Hector Ocegueda
535 S Barranca St #4
Covina, CA 91723

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on February 19, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY - VIA FEDEX

The Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 19, 2025
Date

Caron Burke
Printed Name

/s/ Caron Burke
Signature

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